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Nationstar Mortgage, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ROBERT JORDAN, SEAN HALBERT,
DANA SKELTON, and VANESSA
RUGGLES, individually and on behalf of all
others similarly situated,

Plaintiffs,

vs.

NATIONSTAR MORTGAGE, LLC, a
Delaware limited liability company,

Defendant.

Case No.: 3:14-cv-00787-JSW

**DECLARATION OF KENT LEMON IN
SUPPORT OF DEFENDANT
NATIONSTAR MORTGAGE, LLC'S
MOTION TO STAY PURSUANT TO THE
PRIMARY JURISDICTION DOCTRINE**

[Filed concurrently with Motion to Stay and
Declaration of Jack Gindi]

Date: Wednesday, August 20, 2014
Time: 2:00 p.m.
Dept.: Courtroom 2 – 17th Floor

Complaint Filed: February 21, 2014
Consolidated Amended Complaint Filed:
June 23, 2014

DECLARATION OF KENT LEMON

I, Kent Lemon, declare as follows:

1. I am Senior Vice President of Command Center Operations for defendant Nationstar Mortgage, LLC ("Nationstar") in the above entitled matter. As Senior Vice President of Command Center Operations, among other things, I supervise the practices and procedures employed by Nationstar when contacting customers. I am familiar with the characteristics of the dialing equipment utilized by Nationstar to place calls during the relevant time frame for this litigation. I am competent and authorized to testify to the matters set forth herein based on personal knowledge of the facts stated herein.

2. The dialing equipment utilized by Nationstar to place the calls that are the subject of this lawsuit ("Nationstar's Dialing Equipment") did not store or produce telephone numbers to be called using a random or sequential number generator and the equipment did not dial random or sequential phone numbers.

3. Further, at the time the calls were placed, Nationstar's Dialing Equipment lacked the current capacity to store and produce telephone numbers to be called using a random or sequential number generator and to dial such numbers.

4. Nationstar's Dialing Equipment could only dial phone numbers that were specifically downloaded into the Dialing Equipment.

I declare under penalty of perjury of the laws of California and the United States that the foregoing is true and correct.

Executed on July 10, 2014 at Lewisville, Texas.


Kent Lemon

PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. I am employed in the office of a member of the bar of this court at whose direction the service was made. My business address is REED SMITH LLP, 355 S. Grand Avenue, Suite 2900, Los Angeles, CA 90017.

On July 10, 2014, I electronically filed the following document(s) with the Clerk of the Court using the CM/ECF system, which sent electronic notification of such filing to all other parties appearing on the docket sheet, as listed below.

**DECLARATION OF KENT LEMON IN SUPPORT OF DEFENDANT
NATIONSTAR MORTGAGE, LLC'S MOTION TO STAY PURSUANT TO
THE PRIMARY JURISDICTION DOCTRINE**

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**ATTORNEYS FOR PLAINTIFFS
AND THE PUNTATIVE CLASSES**

I declare under penalty of perjury under the laws of the United States that the above is true and correct. Executed on July 10, 2014, at Los Angeles, California.

/s/Patty Keen
Patty Keen

REED SMITH LLP
A limited liability partnership formed in the State of Delaware